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Attorney for Creditor

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:	Chapter 11
New England Motor Freight, Inc., <i>et al</i> ,	Case No. 19-12809-JKS (Jointly Administered)
Debtors. ¹	Judge John K. Sherwood

**APPLICATION FOR ENTRY OF CONSENT ORDER IN LIEU OF MOTION
FOR ORDER CONFIRMING THE AUTOMATIC STAY IS NOT IN EFFECT**

Applicant, VW Credit, Inc. (“Creditor”), by and through its undersigned counsel, states:

1. Creditor submits this Application pursuant to D.N.J. LNR 9021-1(b).
2. On June 7, 2016, the Debtor entered into a Motor Vehicle Lease Agreement (“Lease”) with Creditor for the lease of the following vehicle: 2016 Audi A8 L 3.0T AWD L; VIN: WAU34AFD9GN012479 (“Vehicle”). True and correct copies of the Lease and Title are attached hereto as Composite Exhibit “A.”
3. The Lease matured on June 7, 2019.

¹ The Debtors in these chapter 11 cases and the last four digits of each Debtor’s taxpayer identification number are as follows: New England Motor Freight, Inc. (7697); Eastern Freight Ways, Inc. (3461); NEMF World Transport, Inc. (2777); Apex Logistics, Inc. (5347); Jans Leasing Corp. (9009); Carrier Industries, Inc. (9223); Myar, LLC (4357); MyJon, LLC (7305); Hollywood Avenue Solar, LLC (2206); United Express Solar, LLC (1126); and NEMF Logistics, LLC (4666).

4. On or about January 15, 2019, the Debtor surrendered the Vehicle to Creditor, which effectively rejected the Lease.

5. 11 U.S.C. §365(p)(1) states:

If a lease of personal property is rejected or not timely assumed by the trustee under subsection (d), the leased property is no longer property of the estate and the stay under section 362(a) is automatically terminated.

6. 11 U.S.C. §362(j) states:

(j) On request of a party in interest, the court shall issue an order under subsection (c) confirming that the automatic stay has been terminated.

7. Creditor seeks an Order Confirming the Automatic Stay is not in Effect as to it to proceed with the sale and liquidation of its interest in the Vehicle.

WHEREFORE, Creditor respectfully requests the Court enter the Consent Order submitted hereto, pursuant to D.N.J. LNR 9021-1(b).

Dated: September 30, 2019

Stewart Legal Group, P.L.
Attorney for VW Credit, Inc.

By: /s/Gavin N. Stewart
Gavin N. Stewart